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11 A PLACE FOR MOM

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WILLIAM ALAN GLUCK, MONA
SANCHEZ, and JANI BIELENBERG,
individually and on behalf of all employees
similarly situated,

Plaintiffs,

v.

A PLACE FOR MOM, a Washington
corporation; and DOES 1 to 10, inclusive

Defendants.

Case No. CV 08-0030 PJH

**STIPULATION FOR ORDER
CONTINUING DISCOVERY
DEADLINES; [PROPOSED] ORDER**

Complaint filed: November 21, 2007
Date of Removal: January 3, 2008

Trial: March 8, 2010

STIPULATION

Plaintiffs WILLIAM ALAN GLUCK, MONA SANCHEZ AND JANI BIELENBERG, individually and on behalf of others similarly situated (“Plaintiffs”), and Defendant, A PLACE FOR MOM (“Defendant”) (collectively the “Parties”) hereby stipulate as follows:

WHEREAS, this case was commenced on November 21, 2007, in the Superior Court of California, County of Alameda, alleging various wage and hour violations under the FLSA and the California labor code and thereafter on January 3, 2008, Defendants removed the action to this Court, and filed their Answer;

WHEREAS, the Complaint alleges both a nationwide “opt-in” collective action for claims under the FLSA and a California state-wide “opt-out” class for claims under California state laws;

WHEREAS, on August 13, 2009, a further case management conference was held during which the Court decided that the dates for filing motions for class certification and hearing dispositive motions would not change, but that the parties would be allowed to meet and confer and submit a stipulation moving the discovery deadlines.

THEREFORE, having met and conferred on new discovery deadlines, the parties respectfully submit the following schedule of pretrial dates for the Court's approval:

1. The deadline for Plaintiffs to file their class certification motions will remain **October 30, 2009**.
2. The deadline for all dispositive motions to be heard will remain **November 18, 2009**.
3. The deadline for the parties' disclosure of retained and non-retained expert witnesses to be continued from October 16, 2009 to **December 23, 2009**.
4. The deadline for the parties' disclosure of retained and non-retained rebuttal expert witnesses to be continued from November 6, 2009 to **January 13, 2010**.
5. The deadline for non-expert discovery to be completed to be continued from September 16, 2009 to **January 25, 2010**.

1 6. The deadline for expert discovery to be completed to be continued from
2 December 4, 2009 to January 25, 2010.

3 **SO STIPULATED**

5 DATED: August 24 2009

KERR & WAGSTAFFE LLP

6 By

7 MICHAEL VON LOEWENFELDT

8 Attorneys for Defendant
9 A PLACE FOR MOM

10 DATED: August 12 2009

CLASS ACTION LITIGATION GROUP

12 By

13 RENE E. BARGE

14 Attorneys for Plaintiffs
15 WILLIAM ALAN GLUCK, MONA SANCHEZ,
16 and JANI BIELENBERG

17 DATED: August __, 2009

THE FELDMAN LAW FIRM

18 By

19 LEE FELDMAN

20 Attorneys for Plaintiffs
21 WILLIAM ALAN GLUCK, MONA SANCHEZ,
22 and JANI BIELENBERG

1 6. The deadline for expert discovery to be completed to be continued from
2 December 4, 2009 to January 25, 2010.

3 **SO STIPULATED**

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5 DATED: August __, 2009

KERR & WAGSTAFFE LLP

6

7

By

MICHAEL VON LOEWENFELDT

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Attorneys for Defendant
A PLACE FOR MOM

10

11

DATED: August __, 2009

CLASS ACTION LITIGATION GROUP

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By

RENE L. BARGE

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Attorneys for Plaintiffs
WILLIAM ALAN GLUCK, MONA SANCHEZ,
and JANI BIELENBERG

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DATED: August 21, 2009

THE FELDMAN LAW FIRM

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By

JENNIFER PEPPERS

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Attorneys for Plaintiffs

WILLIAM ALAN GLUCK, MONA SANCHEZ,
and JANI BIELENBERG

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2 [PROPOSED] ORDER

3 PURSUANT TO STIPULATION AND THE COURT'S PRIOR INSTRUCTIONS, IT IS
4 HEREBY ORDERED that:

- 5 1. The deadline for Plaintiffs to file their class certification motions will remain
6 **October 30, 2009.**
- 7 2. The deadline for all dispositive motions to be heard will remain **November 18, 2009.**
- 8 3. The deadline for the parties' disclosure of retained and non-retained expert witnesses
9 to be continued from October 16, 2009 to **December 23, 2009.**
- 10 4. The deadline for the parties' disclosure of retained and non-retained rebuttal expert
11 witnesses to be continued from November 6, 2009 to **January 13, 2010.**
- 12 5. The deadline for the non-expert discovery to be completed be continued from
13 September 16, 2009 to **January 25, 2010.**
- 14 6. The deadline for the expert discovery to be completed be continued from December
15 4, 2009 to **January 25, 2010.**

16 IT IS SO ORDERED

17
18 Dated: 9/2/09

